



OFFICE OF THE DISTRICT ATTORNEY  
RICHMOND COUNTY  
MICHAEL E. McMAHON  
DISTRICT ATTORNEY

ANTONIA ASSENSO  
ASSISTANT DISTRICT ATTORNEY  
718.556.7101

November 19, 2020

[REDACTED]

[REDACTED]

Dear Counselor,

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosures:

The People are aware that during the time he has been employed by the New York City Police Department, Police Officer Sean Salvatore has been named as a defendant or co-defendant in several federal civil lawsuits.

1. *Pajoohi v. City of New York*, 14-cv-1937 – filed in the Eastern District of New York, settled for an undisclosed amount in 2015, without any admission of fault or liability by the defendants.

In the cases that settled, a stipulation of settlement and order of dismissal with prejudice was filed with the respective court, indicating, in sum and substance, that nothing in the settlement shall be construed as an admission or concession of liability by any of the defendants or the City of New York regarding any of the allegations made by the plaintiffs in their complaints, or that any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call Antonia Assenso at (718) 556-7101 during office hours.

Sincerely,

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Antonia Assenso  
*Assistant District Attorney*

cc: Clerk of the Court

